

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF GEORGIA  
SAVANNAH DIVISION

FILED  
U.S. DISTRICT COURT

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CLERK Cesbell  
SO. DIST. OF GA.

UNITED STATES OF AMERICA

v.

JACOB BRAGG

) INDICTMENT NO.

)

) 18 U.S.C. § 1951

) Interference with Commerce by

) Robbery, Conspiracy

)

) 18 U.S.C. § 924(o)

) Conspiracy to Possess a Firearm in

) Furtherance of a Crime of Violence

)

) 18 U.S.C. § 924(c)

) Possession of a Firearm in

) Furtherance of a Crime of Violence

THE GRAND JURY CHARGES THAT:

CR 422-098

INTRODUCTION

At all times material to this indictment, the following businesses operated convenience stores in Chatham County, Georgia that sell items such as food, beverages, and other items commonly sold at convenience stores: Mini Mart, located at 403 U.S. Highway 80 in Garden City, Georgia; Mr. Fuel, located at 1504 Dean Forest Road in Garden City, Georgia; and the Lottery Store, located at 1554 U.S. Highway 80 East in Pooler, Georgia. These businesses were businesses that affected interstate commerce.

**COUNT ONE**

*Conspiracy to Interfere with Commerce by Robbery*  
18 U.S.C. § 1951(a)

In or around October 2021, in Chatham County, within the Southern District of Georgia, the defendant,

**JACOB BRAGG,**

did knowingly and intentionally combine, conspire, confederate, and agree with at least one other person to obstruct commerce and the movement of articles and commodities in such commerce by robbery, in that the defendant conspired to unlawfully take and obtain property from Chatham County convenience stores, against the will of and from the persons and in the presence of store employees, by means of actual and threatened force, violence, and fear of injury to the employees.

All in violation of Title 18, United States Code, Section 1951(a).

**COUNT TWO**

*Conspiracy to Possess a Firearm in  
Furtherance of a Crime of Violence*  
18 U.S.C. § 924(o)

In or around October 2021, in Chatham County, within the Southern District of Georgia, the defendant,

**JACOB BRAGG,**

did knowingly and intentionally combine, conspire, and agree with at least one other person to possess a firearm in furtherance of a crime of violence for which they may be prosecuted in a court of the United States, to wit, Interference with Commerce by Robbery, in violation of Title 18, United States Code, Section 1951(a).

All in violation of Title 18, United States Code, Section 924(o).

**COUNT THREE**

*Interference with Commerce by Robbery*

18 U.S.C. § 1951(a)

On or about October 9, 2021, in Chatham County, within the Southern District of Georgia, the defendant,

**JACOB BRAGG,**

aiding and abetting another, did obstruct, delay, and affect commerce as that term is defined in Title 18, United States Code, Section 1951, and the movement of articles and commodities in such commerce, by robbery as that term is defined in said statute, in that Defendant, aided and abetted by another, did unlawfully take and obtain property consisting of merchandise and United States Currency from Mini Mart, against the will of at least one employee by means of actual and threatened force, violence and fear of injury, immediate and future, to the employee, and to property in the employee's custody and possession, that is, Defendant and an accomplice did enter the business, brandish and use a firearm, threaten at least one employee, and take property belonging to the business.

All in violation of Title 18, United States Code, Sections 1951(a) & 2.

**COUNT FOUR**

*Possession of a Firearm in Furtherance of a Crime of Violence*

18 U.S.C. § 924(c)

On or about October 9, 2021, in Chatham County, within the Southern District of Georgia, the defendant,

**JACOB BRAGG,**

did aid and abet the possession and brandishing of a firearm, to wit, a handgun, in furtherance of a crime of violence for which he may be prosecuted in a court of the United States, to wit, Interference with Commerce by Robbery, in violation of Title 18, United States Code, Section 1951(a), as charged in Count 3 of this Indictment.

All in violation of Title 18, United States Code, Sections 924(c) & 2.

**COUNT FIVE**  
*Interference with Commerce by Robbery*  
18 U.S.C. § 1951(a)

On or about October 12, 2021, in Chatham County, within the Southern District of Georgia, the defendant,

**JACOB BRAGG,**

did unlawfully obstruct, delay, and affect commerce as that term is defined in Title 18, United States Code, Section 1951, and the movement of articles and commodities in such commerce, by robbery as that term is defined in said statute, in that Defendant did unlawfully take and obtain property consisting of United States Currency from Mr. Fuel, against the will of at least one employee by means of actual and threatened force, violence and fear of injury, immediate and future, to the employee, and to property in the employee's custody and possession, that is, he and an accomplice did enter the business, brandish and use a firearm, threaten at least one employee, and take money belonging to the business, and did aid and abet another in so doing.

All in violation of Title 18, United States Code, Sections 1951(a) & 2.

**COUNT SIX**

*Possession of a Firearm in Furtherance of a Crime of Violence*  
18 U.S.C. § 924(c)

On or about October 12, 2021, in Chatham County, within the Southern District of Georgia, the defendant,

**JACOB BRAGG,**

did knowingly possess and brandish a firearm, to wit, a handgun, in furtherance of a crime of violence for which he may be prosecuted in a court of the United States, to wit, Interference with Commerce by Robbery, in violation of Title 18, United States Code, Section 1951(a), as charged in Count 5 of this Indictment.

All in violation of Title 18, United States Code, Section 924(c).

**COUNT SEVEN**

*Interference with Commerce by Robbery*  
18 U.S.C. § 1951(a)

On or about October 13, 2021, in Chatham County, within the Southern District of Georgia, the defendant,

**JACOB BRAGG,**

aiding and abetting another, did unlawfully obstruct, delay, and affect commerce as that term is defined in Title 18, United States Code, Section 1951, and the movement of articles and commodities in such commerce, by robbery as that term is defined in said statute, in that the Defendant and an accomplice did unlawfully take and obtain merchandise and United States Currency from the Lottery Store, against the will of at least one employee by means of actual and threatened force, violence and fear of injury, immediate and future, to the employee, and to property in the employee's

custody and possession, that is, he and an accomplice did enter the business, brandish and use a firearm, threaten at least one employee, and take money belonging to the business.

All in violation of Title 18, United States Code, Sections 1951(a) & 2.

**COUNT EIGHT**

*Possession of a Firearm in Furtherance of a Crime of Violence*  
18 U.S.C. § 924(c)

On or about October 13, 2021, in Chatham County, within the Southern District of Georgia, the defendant,

**JACOB BRAGG,**

did aid and abet the possession and brandishing of a firearm, to wit, a handgun, in furtherance of a crime of violence for which he may be prosecuted in a court of the United States, to wit, Interference with Commerce by Robbery, in violation of Title 18, United States Code, Section 1951(a), as charged in Count 7 of this Indictment.

All in violation of Title 18, United States Code, Sections 924(c) & 2.

**COUNT NINE**

*Interference with Commerce by Robbery*  
18 U.S.C. § 1951(a)

On or about October 16, 2021, in Chatham County, within the Southern District of Georgia, the defendant,

**JACOB BRAGG,**

aiding and abetting another, did unlawfully obstruct, delay, and affect commerce as that term is defined in Title 18, United States Code, Section 1951, and the movement of articles and commodities in such commerce, by robbery as that term is defined in

said statute, in that Defendant did unlawfully take and obtain merchandise and United States Currency from Mini Mart, against the will of at least one employee by means of actual and threatened force, violence and fear of injury, immediate and future, to the employee, and to property in the employee's custody and possession, that is, he and an accomplice did enter the business, brandish and use a firearm, threaten at least one employee, and take money belonging to the business.

All in violation of Title 18, United States Code, Section 1951(a).

**COUNT TEN**

*Possession of a Firearm in Furtherance of a Crime of Violence*  
18 U.S.C. § 924(c)

On or about October 16, 2021, in Chatham County, within the Southern District of Georgia, the defendant,

**JACOB BRAGG,**

did knowingly possess and brandish a firearm, to wit, a handgun, in furtherance of a crime of violence for which he may be prosecuted in a court of the United States, to wit, Interference with Commerce by Robbery, in violation of Title 18, United States Code, Section 1951(a), as charged in Count 9 of this Indictment.

All in violation of Title 18, United States Code, Section 924(c).

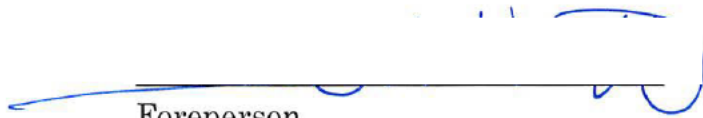
### **FORFEITURE ALLEGATION**

The allegations contained in Counts One through Ten of this Indictment are hereby re-alleged and incorporated by reference for the purpose of alleging forfeitures pursuant to Title 18, United States Code, Sections 981(a)(1)(C) and 924(d), and Title 28, United States Code, Section 2461(c).

Upon conviction of one or more of the offenses charged in Counts One through Ten in violation of Title 18, United States Code, Sections 1951(a) and 924 set forth in this Indictment, **JACOB BRAGG**, shall forfeit to the United States of America, pursuant to Title 18, United States Code, Section 981(a)(1)(C) and Title 28, United States Code, Section 2461(c), any property constituting, or derived from, proceeds obtained, directly or indirectly, as a result of such violation, and shall forfeit, pursuant to Title 18, United States Code, Section 924(d), any firearm and ammunition involved in the commission of the offense(s), including, but not limited to, a SCCY CPX-1 9 mm caliber pistol bearing serial number 068906 and Glock 43x 9 mm caliber pistol bearing serial number BNUL435.



A True Bill.

  
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Foreperson  
\_\_\_\_\_  
David H. Estes  
United States Attorney  
\_\_\_\_\_  
Chris Howard  
Assistant United States Attorney  
\*Lead Counsel  
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